



October 3, 2011

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: Telecommunications Relay Service ("TRS") & Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket No. 10-51 (Via ECFS)

Dear Ms. Dortch:

Pursuant to 47 C.F.R. § 0.459, Snap Telecommunications, Inc. ("Snap!VRS") hereby requests confidential treatment for the confidential portions of the attached report for Video Relay Services (VRS). These portions of the report contain company-specific, proprietary commercial information that is not routinely available for public inspection and is safeguarded from competitors. Accordingly, it should be protected from disclosure pursuant to 47 C.F.R. § 0.457(d) and Exemption 4 of the Freedom of Information Act, 5 U.S.C. § 552(b)(4). Below please find a statement of the reasons for withholding the materials from inspection as well as relevant facts surrounding this request.

1. Identification of the specific information for which confidential treatment is sought. Snap!VRS requests that the pages of the attached presentation that are marked "CONTAINS CONFIDENTIAL INFORMATION – NOT FOR PUBLIC INSPECTION" and redacted in the public version of the report be treated as confidential.

2. Identification of the Commission proceeding in which the information was submitted or a description of the circumstance giving rise to the submission. Snap!VRS is providing this information per the requirements of 47 C.F.R. §64.604(N)(2).

3. Explanation of the degree to which the information is commercial or financial or contains a trade secret or is privileged. The information at issue is highly confidential and specific to Snap!VRS, detailing information related to its call centers. This information is sensitive for competitive reasons. It is safeguarded from competitors and is not made available to the public. If this information is not protected, other VRS providers may utilize it to compete against Snap!VRS.

4. Explanation of the degree to which the information concerns a service that is subject to competition. The information provided concerns a service provided by Snap!VRS that is subject to substantial competition.

5. Explanation of how disclosure of the information could result in substantial competitive harm. Disclosure of this information could cause substantial competitive harm to Snap!VRS, because other VRS providers would have access to significant information regarding the company infrastructure, they could use that information to compete more effectively against Snap!VRS and undermine the company's position in the VRS marketplace.



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6. Identification of any measures taken by the submitting party to prevent unauthorized disclosure. Snap!VRS routinely treats this information as highly confidential and exercises significant care to ensure that such information is not disclosed to its competitors.

7. Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties. Snap!VRS does not make this information available to the public, and this information has not been previously disclosed to third parties.

8. Justification of the period during which the submitting party asserts that the material should not be available for public disclosure. Snap!VRS requests that this information be treated as being confidential on an indefinite basis as it cannot identify a certain date at which this information could be disclosed without causing competitive harm to Snap!VRS.

9. Any other information that the party seeking confidential treatment believes may be useful in assessing whether its request for confidentiality should be granted. This information is being provided in accordance with the requirements of 47 C.F.R. §64.604(N)(2). If a request is submitted for disclosure of this information, please provide sufficient notice to the undersigned to allow Snap!VRS to take appropriate steps to safeguard the confidentiality of the information. In addition, should this request for confidentiality be denied, Snap!VRS requests that this information be returned by the Commission without consideration.

If there are any questions regarding this request, please do not hesitate to contact me.

Sincerely,

/s/

Nancy J. Bloch
Chief Regulatory Liaison and Advisor
443-438-1328 V/VP
nbloch@snapvrs.com

cc: Thomas W. Kielty, President and Chief Executive Officer
Steph Buell, Chief Compliance Officer

Attachment



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Dear Ms. Dortch:

Pursuant to 47 C.F.R. §64.604(N)(2), Snap Telecommunications, Inc. ("Snap!VRS") hereby files its redacted semiannual report on call centers.

The full, unredacted call center detail has been sent electronically to Gregory Hlibok, Chief, Disability Rights Office, FCC Consumer and Governmental Affairs Bureau as well as to Rolka Loube Saltzer Associates (RLSA), the TRS Fund Administrator.

If there are any questions regarding this request, please do not hesitate to contact me.

Sincerely,

/s/

Nancy J. Bloch
Chief Regulatory Liaison and Advisor
443-438-1328 V/VP
nbloch@snapvrs.com

cc: Thomas W. Kielty, President and Chief Executive Officer
Steph Buell, Chief Compliance Officer

Attachment (redacted)